

Exhibit I

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO

MELODY JOY CANTU AND DR.
RODRIGO CANTU,

Plaintiffs,

v.

5:20-CV-0746JKP-HJB

DR. SANDRA GUERRA AND DIGITAL
FORENSICS CORPORATION, LLC,

Defendants.

The Videotape Deposition of SANDRA GUERRA, taken at the request of the Plaintiffs, before Truenea Teasley, CSR in the State of Texas, pursuant to Federal Rules of Civil Procedure, on Thursday, July 21, 2022, from 10:02 a.m. to 1:30 p.m., at 755 East Mulberry Avenue, Suite 250, San Antonio, Texas 78212, conducted remotely.

A P P E A R A N C E S

For the Plaintiffs (Remotely):

Tor Ekeland
 Tor Ekeland Law, PLLC
 30 Wall Street, 8th Floor
 New York, New York 10005
 tor@torekeland.com

For the Defendant (Remotely):

Brandy Peery
 Cedillo & Mendoza, Inc.
 755 East Mulberry, Suite 250
 San Antonio, Texas 78212
 beery@lawdcm.com

ALSO PRESENT:

Liz Kemp, Videographer
 Melody Cantu
 Nicole Guitelman

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1 If we could go to the paragraph on the
2 bottom of the page.

3 A. I have read the statement.

4 Q. (BY MR. EKELAND) And you can see the first
5 sentence that says: DFC engineers acquired and
6 archived the client's LinkedIn and Facebook accounts.

7 Correct?

8 A. That is what the statement says.

9 Q. And do you have any reason to believe that
10 that statement isn't true?

11 MS. PEERY: Objection, form.

12 A. No.

13 No.

14 MR. EKELAND: We can go to page 16,
15 please.

16 Q. (BY MR. EKELAND) Directing your attention to
17 the sentence at the top of the page.

18 A. I have read the statement.

19 Q. And is it your understanding that DFC's
20 forensic examiners created some links for you?

21 MS. PEERY: Objection, form.

22 A. It is my understanding that DFC, per their
23 report, created some links.

24 Q. (BY MR. EKELAND) Is it your testimony that
25 they merely created the links for this report?

1 MS. PEERY: Objection, form.

2 A. That is not my statement.

3 Q. (BY MR. EKELAND) What is your statement?

4 MS. PEERY: Form.

5 A. According to this report, links were created.

6 Q. (BY MR. EKELAND) Directing your attention to
7 the second bullet point on the page.

8 MR. EKELAND: If you would highlight
9 that, please.

10 A. I have read the statement.

11 Q. (BY MR. EKELAND) So you see how it says:
12 Each individual tracking URL captures IP address,
13 operating system, browser, screen resolution and hash
14 information for the device from which the tracking URL
15 is clicked.

16 Do you have any reason to believe that
17 that's not a true statement?

18 MS. PEERY: Objection, form.

19 A. I do not have any reason to believe that that
20 is not a true statement.

21 Q. (BY MR. EKELAND) As a matter of fact, it's
22 one of the things you were paying DFC \$3,000 to do for
23 you. Correct?

24 MS. PEERY: Objection, form.

25 A. This was part of what they did in creating the

1 report.

2 Q. (BY MR. EKELAND) So bringing your attention
3 to the second bullet point up from the bottom with the
4 lead word in bold "First."

5 MR. EKELAND: And if we could get it all
6 the way down to where it says CX_Sandra Guerra.

7 A. I have read the statement.

8 Q. (BY MR. EKELAND) Did you see on the bottom
9 where it says CX_Sandra_Guerra, and there's an
10 <https://goo.gl/G5GE9Z>

11 Do you see that?

12 MS. PEERY: Objection, form.

13 A. Yes. You repeated it a little bit
14 incorrectly, but yes, I see what you're referring to.
15 You put an extra G in. But yes, I understand what
16 you're referring to.

17 Q. (BY MR. EKELAND) I defer to you and the text
18 on that.

19 Is it your testimony that that's -- you
20 never sent that link to Sandra Guerra -- Melody Joy
21 Cantu? Excuse me.

22 A. It is my testimony I did not send that link to
23 Melody Joy Cantu.

24 Q. (BY MR. EKELAND) Directing your attention to
25 the last bullet point.

1 A. I have read the statement.

2 Q. Can you see how in the last sentence it says:
3 You need to send the URL to each suspect on whatever
4 platform, e-mail, social media, text message works best
5 for that subject.

6 Correct?

7 A. I see that. I see the text that is before me,
8 yes.

9 Q. And it's your testimony that you never did any
10 of that?

11 MS. PEERY: Objection, form.

12 A. That is correct.

13 MR. EKELAND: Directing -- if I could get
14 page 19 up.

15 And if we could highlight the client
16 directed tracking URLs section with the two links
17 underneath it.

18 A. I have read the statement in front of me.

19 Q. (BY MR. EKELAND) And so you see the phrase
20 "Client-directed tracking URLs." Correct?

21 A. I do see that.

22 Q. What's your understanding of that phrase?

23 MS. PEERY: Objection, form.

24 Q. (BY MR. EKELAND) You can answer.

25 A. I didn't write that statement. I can't

1 interpret it.

2 Q. You see how underneath it, it says:
3 Melody_Cantu, and next to it it says https: and it's
4 followed by some other stuff.

5 Do you see that?

6 A. I do.

7 Q. And it's your testimony here today that you
8 never sent that link to either of the Cantus in any
9 way, shape or form.

10 A. That is correct.

11 Q. And do you see where it says Rodrigo_Cantu and
12 there's https: and the rest (indiscernible). It's your
13 testimony here today that you never sent that link out
14 to either of the Cantus. Correct?

15 A. That is correct.

16 MR. EKELAND: If we could now highlight
17 all the DFC directed tracking URL section.

18 A. I see the statement.

19 Q. (BY MR. EKELAND) And so you see the phrase
20 DFC directed tracking URLs.

21 Correct?

22 A. I do.

23 Q. What's your understanding of that phrase?

24 MS. PEERY: Objection, form.

25 Q. (BY MR. EKELAND) You can answer.

1 A. I didn't write it so I'm not going to
2 speculate what it means.

3 Q. And so you see underneath it where it says
4 Melody_Joy_from_Teresa and everything that follows in
5 that line?

6 A. Yes, I do see it.

7 Q. And it's your testimony here today that that
8 link that starts with the https you never sent to
9 either of the Cantus in any way, shape or form.

10 MS. PEERY: Objection.

11 A. That is accurate.

12 Q. (BY MR. EKELAND) And directing your attention
13 to the next line, it's Dr.Cantu_from_Melissa, followed
14 by a hypertense link -- hypertense link https.

15 It's your testimony here today that you
16 never sent that link to plaintiffs in any way, shape or
17 form.

18 MS. PEERY: Objection, form.

19 A. That is correct.

20 Q. (BY MR. EKELAND) And directing your attention
21 to the Melody_Joy_via_Phone and the link that follows
22 that, is it your testimony here today that you never
23 sent that in any way, shape or form to the plaintiff?

24 MS. PEERY: Objection, form.

25 A. That is correct.

1 MR. EKELAND: If we could go to the first
2 bullet point in the box in the bottom of this page
3 right under important.

4 Q. (BY MR. EKELAND) Can you let me know when
5 you're done reading.

6 A. I have read the statement.

7 Q. And so you've never ever notified DFC that you
8 sent out tracking URLs to the Cantus. Correct?

9 A. That is correct.

10 MR. EKELAND: If you could go to page 21,
11 please.

12 Q. (BY MR. EKELAND) And if we could look at
13 the -- you can see the whole thing.

14 Do you see the tracking link up at the
15 top where it says Melody_Joy_via_Phone?

16 A. I do see that.

17 Q. And that's one of the DFC directed links we
18 just looked at. Correct?

19 MS. PEERY: Objection, form.

20 A. I assume that it is. I do not --

21 Q. (BY MR. EKELAND) We can match them so I'm not
22 worried about it.

23 And underneath you see --

24 MS. PEERY: Form.

25 Q. (BY MR. EKELAND) -- a table that says first

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I, SANDRA GUERRA, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

SUBSCRIBED AND SWORN TO before me this the

SEAL:

EXPIRES:

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO
4

5 MELODY JOY CANTU AND DR.
6 RODRIGO CANTU,

7 Plaintiffs,

8 v.

5:20-CV-0746JKP-HJB

9 DR. SANDRA GUERRA AND DIGITAL
10 FORENSICS CORPORATION, LLC,
11 Defendants.
12

13 CERTIFICATE OF COMPLETION OF DEPOSITION

14 I, TRUENEA TEASLEY, CSR #8719, DO HEREBY CERTIFY
15 that on July 21, 2022, the deposition of Sandra Guerra,
16 M.D., was taken before me at the request of, and sealed
17 original thereof retained by:

18 For the Plaintiffs (Remotely):

19 Tor Ekeland
20 Tor Ekeland Law, PLLC
21 30 Wall Street, 8th Floor
22 New York, New York 10005
23 tor@torekeland.com
24

25 I FURTHER CERTIFY that copies of this certificate
have been mailed to or delivered to all counsel, and
parties to the proceedings not represented by counsel,
appearing at the taking of the deposition:

For the Defendant (Remotely):

Brandy Peery
Cedillo & Mendoza, Inc.
755 East Mulberry, Suite 250
San Antonio, Texas 78212
beery@lawdcm.com

1 I FURTHER CERTIFY that examination of this
transcript and signature of the witness was reserved by
2 the witness and all parties present. On
_____, 2022, a letter was mailed or
3 delivered to Ms. Brandy Peery regarding obtaining
signature of the witness, and corrections, if any, were
4 appended to the original and each copy of this
deposition.

5
6 I FURTHER CERTIFY that the cost of the original
and one copy of the deposition, including exhibits, to
7 Mr. Tor Ekeland, is \$ _____.
8

9 I FURTHER CERTIFY that I did administer the oath
to the witness herein prior to the taking of this
10 deposition; that I did thereafter report in
stenographic shorthand the questions and answers set
11 forth herein, and the foregoing is a true and correct
transcript of the proceeding had upon the taking of
12 this deposition to the best of my ability.
13

14 I FURTHER CERTIFY that I am neither employed by
nor related to any of the parties or attorneys in this
15 case, and that I have no interest in the final
disposition of this case in any court.
16
17
18

19 TRUENEA TEASLEY, CSR/RPR/CCR
CSR No. 8719
License Expires: 09-30-2022
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